



THE CITY OF NEW YORK
LAW DEPARTMENT

MURIEL GOODE-TRUFANT
Acting Corporation Counsel

MARY JANE ANDERSON
Assistant Corporation Counsel
Phone: (212) 356-2415

This request is GRANTED. The Parties shall provide another update on **September 27th**.

The Clerk of the Court is respectfully requested to close Dkt. Nos. 273, 274, and 286.

SO ORDERED.

Jennifer E. Willis
Jennifer E. Willis
United States Magistrate Judge

August 29, 2024

VIA E.C.F.

Honorable Jennifer E. Willis
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

RE: Patricia Scott Fleming, et al., v. City of New York, et al.,
18 Civ. 4866 (GBD) (JW)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and one of the attorneys handling the defense of the above referenced matter. Defendants write to respectfully request a brief stay of discovery in this matter until September 27, 2024. This is the City Defendants' first request for a stay of the case. All parties consent to the instant request.

By way of relevant background, on June 1, 2018, plaintiff initiated this action. Discovery has been ongoing since the beginning of 2021, (see ECF No. 175), and the parties are presently engaged in extensive Monell discovery. This case was only reassigned to the undersigned last week. Upon brief review of the case, we have determined that we require additional time to review the file and familiarize ourselves with the case before we can proceed with discovery in this action.

Federal courts have inherent power and discretionary authority to stay a case if the interests of justice so require. United States v. Kordel, 397 U.S. 1, 12 n. 27 (1970). A stay in this action would streamline later discovery because it will afford us an appropriate amount of time to familiarize ourselves with the case. A stay now will allow us to have productive conversations about discovery deadlines after September 27, 2024, and will save the Court and the parties additional time and resources. Additionally, the City Defendants' lead attorney, Mark Zuckerman, is on a pre-scheduled vacation for the next two weeks. Discovery is extensive and as such, we require a brief stay and to set realistic discovery deadlines at the end of the stay.

Accordingly, the City Defendants respectfully request a stay of discovery in this action until September 27, 2024.

The City Defendants thank the Court for its time and consideration herein.

Respectfully submitted,

Mary Jane Anderson /s/

Mary Jane Anderson
Assistant Corporation Counsel
Special Federal Litigation Division

cc: VIA E.C.F.
Counsel of Record